1 Ernest Cory (Admitted Pro Hac Vice) Alabama Bar No.: asb-2279-y83e 2 CORY WATSON, P.C. 2131 Magnolia Avenue 3 Birmingham, AL 35205 Telephone: (205) 328-2200 4 Facsimile: (205) 324-7896 Email: ecory@corywatson.com 5 Lead Counsel for Plaintiffs 6 7 8 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 9 (SAN FRANCISCO DIVISION) 10 Case No. 3:16-MD-2691-RS In re: 11 MDL No. 2691 VIAGRA (SILDENAFIL CITRATE) AND 12 CIALIS (TADALAFIL) PRODUCTS PLAINTIFFS' ADMINISTRATIVE 13 LIABILITY LITIGATION MOTION TO FILE UNDER SEAL 14 Judge: Honorable Sallie Kim 15 This Document Relates to: ALL ACTIONS 16 17 18 Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiffs respectfully request that this 19 Court allow filing under seal the following documents: 20 1. Defendant Pfizer's Partially Privileged Document Log; 21 2. Defendant Pfizer's Completely Privileged Document Log. 22 On July 20, 2017, the undersigned provided the above listed documents to The 23 Honorable Magistrate Judge Sallie Kim in native excel format via e-mail. After receiving the 24 above documents, the Magistrate's Clerk requested that Plaintiffs file this Administrative Motion to File Under Seal. The documents are filed as exhibits to the Joint Letter Brief 25 Regarding Pfizer Documents Withheld as Privileged and Plaintiffs' Request for Random 26 Sampling (ECF Doc. 535). 27 28

Plaintiffs are moving to seal these documents as they contain information Defendants 1 2 designated as confidential pursuant to the Protective Order. Accordingly, Plaintiffs respectfully request that this Administrative Motion to File 3 4 Under Seal be granted. Respectfully submitted, 5 6 Dated: July 26, 2017 CORY WATSON, P.C 7 /s/ Ernest Cory 8 Ernest Cory (Admitted Pro Hac Vice) Alabama Bar No.: asb-2279-y83e 9 CORY WATSON, P.C. 2131 Magnolia Avenue 10 Birmingham, AL 35205 Telephone: (205) 328-2200 11 Facsimile: (205) 324-7896 12 Email: ecory@corywatson.com 13 Lead Counsel for Plaintiffs 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28